

1 Joel E. Tasca  
 Nevada Bar No. 14124  
 2 Joseph Dagher  
 Nevada Bar No. 15204  
 3 BALLARD SPAHR LLP  
 1980 Festival Plaza Drive, Suite 900  
 4 Las Vegas, Nevada 89135  
 Telephone: (702) 471-7000  
 5 Facsimile: (702) 471-7070  
 E-mail: tasca@ballardspahr.com  
 6 E-mail: dagherj@ballardspahr.com

7 *Attorneys for Defendants Café De*  
*Manila, LLC; Millie Cadag and Homer*  
 8 *Tuazon*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 JOE HAND PROMOTIONS, INC., a  
 Pennsylvania corporation,

12 Plaintiff,

13 v.

14 CAFÉ DE MANILA, LLC, a Nevada,  
 15 limited liability company d/b/a CAFÉ DE  
 MANILA; MILLIE CADAG, an  
 16 individual; and HOMER TUAZON, an  
 individual,

17 Defendants.  
 18

CASE NO. 2:22-cv-001086-CDS-DJA

STIPULATION AND ORDER TO  
 EXTEND TIME FOR DEFENDANT TO  
 RESPOND TO PLAINTIFF'S  
 COMPLAINT

(Second Request)

19  
 20 Defendants' response to Plaintiff Joe Hand Promotions, Inc.'s ("Plaintiff")  
 21 complaint is due on November 28, 2022. Defendants and Plaintiff agree that  
 22 Defendants have up to and including December 5, 2022, to respond to Plaintiff's  
 23 complaint. The parties are close to reaching a settlement in this matter and will  
 24 need time to finalize the settlement terms.

25 ///

26 ///

27 ///

28

BALLARD SPAHR LLP  
 1980 FESTIVAL PLAZA DRIVE, SUITE 900  
 LAS VEGAS, NEVADA 89135  
 (702) 471-7000 FAX (702) 471-7070

1 This is the second request for an extension, and it is made in good faith and  
2 not for purposes of delay.

3 DATED this 28<sup>th</sup> day of November, 2022.

4 BALLARD SPAHR LLP

GILE LAW GROUP

5 By: /s/ Joseph Dagher

By: /s/ Ryan Gile

6 Joel E. Tasca  
7 Nevada Bar No. 14124  
8 Joseph Dagher  
9 Nevada Bar No. 15204  
10 1980 Festival Plaza Drive, Suite 900  
11 Las Vegas, Nevada 89135

Ryan Gile  
Nevada Bar No. 8807  
1180 N. Town Center Drive, Suite 100  
Las Vegas, Nevada 89144  
(702) 703-7288  
rg@gilelawgroup.com

12 *Attorneys for Defendants*

*Attorneys for Plaintiff*

13  
14 **ORDER**

15 IT IS SO ORDERED:

16   
17 UNITED STATES MAGISTRATE JUDGE

18  
19 DATED: 11/29/2022  
20  
21  
22  
23  
24  
25  
26  
27  
28